

REMARKS

Claims 1-22 are all the claims pending in the application. Claims 1, 10, 15 and 18-30 have been amended. No new matter has been introduced.

Claims Rejections – 35 U.S.C. §103 - Claims 1-9

The Examiner has rejected claims 1-9 under 35 U.S.C. §103 as being allegedly unpatentable over Raab et al. (U.S. patent No. 5,751,967) in view of Schumacher (U.S. patent No. 6,735,765) and further in view of Pothapragada et al. (U.S. patent No. 6,389,432). Applicant respectfully traverses this rejection in view of Applicant's amendments to independent claim 1 and further in view of the following arguments.

Specifically, without admitting that the cited art teaches any other limitations of the pending claims, Applicant respectfully submits that the prior art of record fails to teach or suggest at least the following features of the invention that have been added by the instant amendment, wherein the file system being used by a computer different from the storage apparatus to store data in the storage apparatus, each file system being managed by each of a plurality of file server modules; wherein the user interface is operable to provide a user with information on mapping between the at least one file system and the plurality of segments of the virtual local area network (VLAN) and information on mapping between the at least one file system and the plurality of virtual volumes; and wherein at least one of the processor, the memory, the storage controller and the user interface is operable to update the configuration information based on a request of the user mapping and un-mapping the plurality of segments of the VLAN to the at least one file system and update the configuration information based on the

request of the user mapping and un-mapping the plurality of volumes to the at least one file system.

In more detail, Raab et al. discloses a method and apparatus for automatically configuring a network device to support a virtual network. In the Office Action, the Examiner reads the claimed virtual volume on the mass storage device 207 of the network computing engine (NCE) of the system of Raab et al. However, contrary to the aforesaid added claim limitation, wherein the file system being used by a computer different from the storage apparatus to store data in the storage apparatus, the mass storage device 207 of the network computing engine (NCE) is used exclusively to store internal instructions for the processor 202 of the controller (NCE 210), see Raab et al., col. 5, lines 20-39. Therefore, contrary to the added claim language, in Raab et al., the mass storage device 207 of the network computing engine (NCE) is not used by a computer different from the storage apparatus to store data in the storage apparatus. Moreover, the configuration file 401 of Raab et al., on which the Examiner reads the claimed file system is used by Virtual Auto Config (VAC) Daemon 331 internally, in the NCE itself. Thus, it is not used by a computer different from the storage apparatus to store data in the storage apparatus. Additional reasons why the mass storage device 207 is not a virtual volume contained in previous responses and amendments filed by Applicant. Applicant continues to maintain this position and refer the Examiner to arguments contained in Applicant's responses filed on May 22, 2007 and January 22, 2007. Schumacher and Pothapragada et al. fail to remedy the aforesaid deficiency of Raab et al., and, therefore, claim 1 is patentable over the cited combination of Raab et al., Schumacher and Pothapragada et al. at least for this reason alone.

In addition, the newly amended claim 1 recites the following newly added limitations:
(1) each file system being managed by each of a plurality of file server modules; (2) wherein the user interface is operable to provide a user with information on mapping between the at least one file system and the plurality of segments of the virtual local area network (VLAN) and information on mapping between the at least one file system and the plurality of virtual volumes; and (3) wherein at least one of the processor, the memory, the storage controller and the user interface is operable to update the configuration information based on a request of the user mapping and un-mapping the plurality of segments of the VLAN to the at least one file system and update the configuration information based on the request of the user mapping and un-mapping the plurality of volumes to the at least one file system. Applicant respectfully submits that none of the above limitations (1)-(3) is taught or suggested anywhere in Raab et al., Schumacher and Pothapragada et al., or any combination thereof. Thus, the amended claim 1 is patentable over Raab et al., Schumacher and Pothapragada et al. due to the added limitations (1)-(3) as well.

With respect to rejection of dependent claims 2-9, while continuing to traverse the Examiner's characterization of the teachings of Raab et al., Schumacher and Pothapragada et al., used by the Examiner in rejecting those claims, Applicant respectfully submits that the rejection of those claims has been rendered moot by virtue of Applicant's amendments to the parent independent claim 1 and that these claims are patentable by definition, due to their dependency upon the patentable parent claim 1. Therefore, claims 2-9 are also patentable.

Claims 10-22

The Examiner has rejected claims 10-30 under 35 U.S.C. §103 as being allegedly unpatentable over Raab et al. (U.S. patent No. 5,751,967) in view of Schumacher (U.S. patent No. 6,735,765). Applicant respectfully traverses this rejection in view of Applicant's amendments to independent claims 10, 15 and 18-22 and further in view of the following arguments.

Specifically, the aforesaid independent claims 10, 15 and 18-22 have been amended substantially similarly to claim 1 and, therefore, the above patentability arguments advanced by Applicant with respect to independent claim 1 equally apply to those claims as well. Therefore, claims 10, 15 and 18-22 are patentable over Raab et al. and/or Schumacher or any combination thereof.

With respect to rejection of dependent claims 11-14, 16-17 and 23-30, while continuing to traverse the Examiner's characterization of the teachings of Raab et al. and Schumacher used by the Examiner in rejecting those claims, Applicant respectfully submits that the rejection of those claims has been rendered moot by virtue of Applicant's amendments to the parent independent claims 10, 15 and 18-22 and that these claims are patentable by definition, due to their dependency upon the respective patentable parent claims. Therefore, claims 11-14, 16-17 and 23-30 are also patentable.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

AMENDMENT UNDER 37 C.F.R. § 1.114(c)
U.S. Application No.: 09/996,308

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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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